

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

STATE OF MISSOURI, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR.,
in his official capacity as the President of
the United States of America, *et al.*,

Defendants.

No. 4:21-cv-01329

**PLAINTIFF STATES' MOTION TO LIFT
THE STAY OF THE DISTRICT COURT PROCEEDINGS**

Plaintiffs, the States of Missouri, Nebraska, Arkansas, Kansas, Iowa, Wyoming, Alaska, South Dakota, North Dakota, and New Hampshire, respectfully request that the Court lift the stay of the district court proceedings entered on December 22, 2021. *See* Doc. 40. In support of this Motion, the Plaintiff States incorporate by reference the arguments in their accompanying Memorandum in Support.

Dated: February 23, 2022

Respectfully submitted,

DOUGLAS J. PETERSON
Attorney General of Nebraska

ERIC S. SCHMITT
Attorney General of Missouri

/s/ James A. Campbell

James A. Campbell*

Solicitor General of Nebraska
Office of the Nebraska Attorney General
2115 State Capitol
Lincoln, NE 68509
(402) 471-2682
Jim.Campbell@nebraska.gov
Counsel for Plaintiffs

/s/ Jesus A. Osete

Jesus A. Osete, #69267MO

Deputy Attorney General of Missouri
D. John Sauer, #58721MO
Solicitor General of Missouri
Maddie McMillian Green, #73724MO
Assistant Attorney General for Special Litigation
Office of the Missouri Attorney General
Post Office Box 899
Jefferson City, MO 65102
(573) 751-1800
Jesus.Osete@ago.mo.gov
Counsel for Plaintiffs

Additional counsel listed below

LESLIE RUTLEDGE
Attorney General of Arkansas

/s/ Dylan L. Jacobs

Dylan L. Jacobs
Deputy Solicitor General
Office of the Arkansas Attorney General
323 Center St., Suite 200
Little Rock, AR 72201
(501) 682-2007
Dylan.Jacobs@arkansasag.gov
Counsel for the State of Arkansas

DEREK SCHMIDT
Attorney General of Kansas

/s/ Kurtis Wiard

Kurtis Wiard
Assistant Solicitor General
Office of the Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612
Tel: (785) 296-2215
Fax: (785) 296-6296
E-mail: kurtis.wiard@ag.ks.gov
Counsel for the State of Kansas

JEFFREY S. THOMPSON

Solicitor General

/s/ Samuel P. Langholz

Samuel P. Langholz

Assistant Solicitor General

Office of the Iowa Attorney General

1305 E. Walnut Street

Des Moines, Iowa 50319

(515) 281-5164

jeffrey.thompson@ag.iowa.gov

sam.langholz@ag.iowa.gov

Counsel for the State of Iowa

BRIDGET HILL

Wyoming Attorney General

/s/ Ryan Schelhaas

Chief Deputy Attorney General

Wyoming Attorney General's Office

109 State Capitol

Cheyenne, WY 82002

Telephone: (307) 777-5786

ryan.schelhaas@wyo.gov

Counsel for the State of Wyoming

TREG R. TAYLOR

Attorney General of Alaska

/s/ Cori Mills

Cori M. Mills

Deputy Attorney General of Alaska

Alaska Department of Law

1031 W. 4th Avenue, Suite 200

Anchorage, AK 99502

(907) 269-5100

Cori.Mills@alaska.gov

Counsel for the State of Alaska

JASON R. RAVNSBORG

South Dakota Attorney General

/s/ David M. McVey

David M. McVey

Assistant Attorney General

1302 E. Highway 14, Suite 1

Pierre, SD 57501-8501

Phone: 605-773-3215

E-Mail: david.mcvey@state.sd.us

Counsel for the State of South Dakota

DREW H. WRIGLEY

Attorney General of North Dakota

/s/ Matthew A. Sagsveen

Matthew A. Sagsveen

Solicitor General

State Bar ID No. 05613

Office of Attorney General

500 North 9th Street

Bismarck, ND 58501-4509

Telephone (701) 328-3640

Facsimile (701) 328-4300

masagsve@nd.gov

Counsel for the State of North Dakota

JOHN M. FORMELLA

New Hampshire Attorney General

/s/ Anthony J. Galdieri

Anthony J. Galdieri

Solicitor General

NEW HAMPSHIRE DEPARTMENT OF JUSTICE

33 Capitol Street

Concord, NH 03301

Tel: (603) 271-3658

Anthony.J.Galdieri@doj.nh.gov

Counsel for State of New Hampshire

CERTIFICATE OF SERVICE

I hereby certify that, on February 23, 2022, a true and correct copy of the foregoing and any attachments were filed electronically through the Court's CM/ECF system, to be served on counsel for all parties by operation of the Court's electronic filing system and to be served on those parties that have not appeared who will be served in accordance with the Federal Rules of Civil Procedure by mail or other means agreed to by the party.

/s/ Jesus A. Osete
Counsel for Plaintiffs